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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: 8/20/87
SUBJECT: Jefferson Conner Revitalization Project
Detroit, MI
FROM: Bonnie L. Elder
RPM, CES
TO: Tom Nowicki
ERB

Attached are my comments on your draft letter regarding the above named project. Please call if you've any questions - 64885.

Mr. R. Charles Larlham
Environmental Design Group
1533 Commerce Drive
Stow, Ohio 44224

subject line
-or- first paragraph
indicate the project
ID the Jefferson/Commer
Industrial

Dear Mr. Larlham:

We have considered the information provided during the meeting that occurred on July 27, 1997, in Detroit, Michigan. Tom Nowicki, of my staff, attended this meeting.

One of the most important issues is continuation of coordination. At the meeting, periodical ^{monthly reports} updates were proposed. In addition, we would be contacted expeditiously if problems are identified that require immediate attention. The Michigan Department of Natural Resources will have a more prominent role because of their permitting authorities.

At the meeting, technical guidance was requested regarding topics such as "further investigation criteria" and remediation criteria. Ms Kathy Anderson suggested that USEPA provide a document with a title something like "The most common materials found at Superfund sites and their cleanup criteria." We have not identified such a document. Unfortunately, we cannot provide a generic list of chemicals and levels for what must be removed and what can remain. This information is project specific. The results of a site investigation and risk assessment are used to determine remediation criteria.

there may be such a document - I just am not familiar with it - should check library

library contains much info. on various chemicals - including: Exposure Assessments

also - Federal and State criteria and standards are used to determine clean-up levels.

→ We regret that we are not able to provide more extensive guidance at this time. We may be able to provide more extensive technical guidance as we review investigation results and as questions become more specific.

we can provide guidance - documents
- for example: RI/FS Guidance
Risk Assessment and Endangerment Assessment Guidance
on interpretation of regulations (ie RCRA)

Another issue discussed at the July 27th meeting was our review of quality assurance/quality control plans and health and safety plans. A commitment to our review of these plans was made in this project's environmental impact statement. At the meeting, we noted that we should be given an opportunity to review standard plans and that each contractor's plans must be consistent with the plans that we review. We encourage the City to provide us with these plans as soon as possible.

Chrysler has repeatedly noted the importance of the City assuming all liability for any hazardous materials found at the site. Chrysler should understand that a situation may arise in which Chrysler's liability may be unavoidable. For example, if contamination is found at levels that would qualify for Superfund status, and, if the materials found could have been generated by Chrysler, Chrysler may be identified as a potentially responsible party, regardless of what agreements exist between the City and Chrysler.

At the meeting on July 27th, our facsimile numbers were requested. Our transmission number is 312-886-9096. The verification number is 312-886-3096.

I would not recommend including this paragraph, or addressing this issue without input from ORR - you're not telling Chrysler something they don't already know.

the way this paragraph is written is too simplistic, misleading + not legally correct.

Thank you for the opportunity for coordination regarding the Jefferson/Conner project. Please note that, for this project, the principle contact at the USEPA is now myself, rather than Tom Nowicki. My telephone number is FTS/312-886-7500.

Sincerely yours,

William D. Franz, Chief
Environmental Review Branch
Planning and Management Division

cc: D. Wright, Detroit
B. Eleder, SHE-1a
H. Shakil, MDNR

SME-14:TNowicki:Disk

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